JFD GROUP LTD

(Regulated by the Cyprus Securities & Exchange Commission with registration number 150/11)

PRIVACY POLICY

OCTOBER 2026

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INTRODUCTION

Your privacy is important to us and this Privacy Policy (hereinafter referred to as the "**Policy**") provides important information about how the JFD Group of Companies and its worldwide affiliated companies (hereinafter referred to as "**we**", "**us**", "**our**", "**JFD**") handles the collection, use and protection of personal information it receives through its websites, platforms and upon providing its services. Any reference to "JFD", "us", "our" or "we" in this Policy is a reference to each company that belongs within the JFD Group of Companies as the context requires unless otherwise stated. Similarly, any reference to "you", "your", "yours" or "yourself" in this Policy is a reference to any of our clients, potential clients or users of the websites or platforms as the context requires unless otherwise stated.

JFD is committed in protecting your privacy and handling your data safe and confidential. This Privacy Policy describes what types of personal data we collect, how we use them, when and with whom we share it and how we keep it safe. It also specifies your rights and how you may choose to exercise them.

Please note that this Policy is directed and applies both to existing clients and potential clients of JFD or to authorised representatives/agents or beneficial owners of legal entities or of natural persons which/who are current or are potential clients of JFD, to natural or legal persons who had such a business relationship with JFD in the past.

This Policy applies to any websites of JFD and to any Trading Platform provided by JFD. By accessing our websites, including using any of our communication channels to contact us, we consider that you have read, understood and accepted the terms of this Policy, prior to becoming a client. Once you open an account with us you agree that this Policy, will govern how JFD collects, stores, uses, shares and in any other form process your personal data.

We may make changes to this Policy from time to time and it is important that you check the Policy occasionally for any updates. We encourage you to read the Policy carefully as it forms part of JFD's terms and conditions, terms of business, client agreement and/or terms of use with you, as the case may be.

Through this Policy, the data may be called either "personal data" or "personal information". We may also sometimes collectively refer to handling, collecting, protecting and storing personal data or any such action as "processing" such personal data.

For the purposes of this Policy, personal data shall mean any information relating to a user, client, potential client, partner or third-party which identifies or may identify them, and which includes, for example name, location, identification number and email address.

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1. Who we are:

This Policy applies to the processing activities of the following data controller entities within the JFD Group of Companies, which include:

- JFD Group Ltd, a licenced Cyprus Investment Firm (CIF), regulated by the Cyprus Securities and Exchange Commission ("CySEC") under license number 150/11, with its registered office at 70 Kyrillou Loukareos Street, Kakos Premier Tower, 4156 Limassol, Cyprus.

- JFD Overseas Ltd, a company authorized and regulated by the Vanuatu Financial Services Commission ('VFSC') under License Number 17933.

JFD Group Ltd performs processing on behalf of JFD Overseas Ltd therefore if you are a client of JFD Overseas Ltd, your data are being processed in accordance with this Policy and you are entitled to the same protection and rights mentioned in this Policy.

For further information about JFD and to discover more about our values and mission, we invite you to explore Our Story and find out why you should choose JFD.

2. Consent to Process Data

Please note that you are requested to agree with the terms listed in the given Policy prior to signing up for the creation of your profile or opening of an account. You confirm acceptance of these terms by ticking the box on below the sign-up section. If you decide not to choose to tick the box, then it is considered that you are not giving your consent and the Company cannot collect and process your data nor provide any additional services to you.

If you have given us your specific consent for processing (other than for the reasons set out below) then the lawfulness of such processing is based on that consent. You also consent when we might be transferring your personal information outside the European Economic Area where this is necessary for us to fulfil our contractual obligations to you. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

Kindly note that if you do not provide us with the required data, then we will not be allowed to commence or continue our business relationship either to you as an individual or as the authorised representative/agent or beneficial owner of a legal entity.

We are obligated to collect such personal data not only for the commencement and execution of a business relationship with you but also for the performance of our contractual, regulatory, statutory and legal obligations.

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3. Personal Data we Collect

When you sign up through JFD's website, we collect basic information about you, including your full name, email address, phone number and country of residence. This information is essential for creating your profile and facilitating your access to the MyJFD portal.

For creating and/or opening a Demo or Live account, you must complete the registration by completing an account opening form whereby you should answer some additional questions and provide additional information and/or documents about you. We ask and collect from our clients, prior to using the JFD platform and/or services, the personal data information below:

a) Contact Data: When you sign up for a JFD Profile, we require certain information such as your first name, last name, country of residence, phone and email address. If you decide that you create a Demo or Live Account then additional information will be requested such as nationality, date of birth, place of birth, gender, citizenship, and contact information such as fax number and postal address.

b) Family and Professional Data: include information on your marital status, education, occupation, information regarding your financial situation such as source of wealth and gross annual income.

c) Tax Data: we collect information such as country of residency, tax identification number and citizenship.

d) Financial data: To use the services of JFD we require you to provide certain information (like information about your bank account, name of your bank, IBAN number, SWIFT/BIC number) in order to facilitate the processing of payments.

e) Any other data needed from the Company to perform its due diligence obligations and any other statutory, regulatory, legal obligations.

We also keep records of your trading behaviour, including a record of:

- Products you trade with us
- Historical data about the trades and investments you have made, including the amount invested
- Your preference for certain types of products and services

We are required by law to identify you if you are opening a new account or adding a new signatory to an existing account. Anti-money laundering laws require us to sight and record details of certain documents (i.e. photographic and non-photographic documents) to meet the

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standards, set under those laws. Identification documentation, as required under anti-money laundering legislation or other legislation relevant to the services we provide to you includes:

a) passport;
b) driver's licence (if applicable);
c) national identity card (if applicable);
d) utility bills;
e) trust deed (if applicable);
f) a credit check on the individual; or
g) other information we consider necessary to our functions and activities.

If you are a corporate client we are required to collect additional information such as corporate documents of the legal entity for identifying the entity's address, shareholders, directors, officers, authorised signatories including additional personal information on the Shareholders, Directors and Authorised Representative. We have the right to ask any additional information we deem necessary to be compliant with our legal and regulatory requirements.

We obtain this information in a number of ways through your use of our services and websites, the account opening applications, our demo sign-up forms, webinar sign-up forms, website cookies and similar tracking technology built into our websites, subscribing to news updates and from information provided in the course of our ongoing relationship.

We may also collect this information about you from third parties either through bought-in third party marketing lists, publicly available sources, social media platforms, introducing europe and affiliates, bankers and credit card processors, subscription-based intelligence databases and other third-party associates.

We may ask for other personal information from time to time (for example, through market research, surveys or special offers). If you choose not to provide the information, we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice. If you visit any of our offices or premises, we may have CCTV which will record your image.

4. Information We Collect from Other Sources

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We may collect personal information about you from third party entities when we seek to verify your identity as part of our regulatory requirements during the onboarding process. This may include, for example, identity verification agencies, credit referencing agencies and similar bodies. We may also collect information about you from third parties, when you use or connect to myJFD by or through a third-party platform, such as Facebook or another site, you allow us to access and/or collect certain information from your third-party platform profile/account as permitted by the terms of the agreement and your privacy settings with the third-party platform. We will share such information with the third-party platform for their use.

We may also collect and process personal data which we lawfully obtain not only from you but also from other entities within the JFD Group or other third parties, e.g. public authorities, companies that introduce you to us, companies that process card payments and publicly available sources which we lawfully obtain, and we are permitted to process.

We also have the right and the duty by virtue of its area of activity to check the accuracy of the client data contained in the databases by periodically asking you to update and/or correct or confirm the accuracy of the client data provided.

5. Who receives your personal data

In the course of the performance of our contractual and statutory obligations for the purposes described above, your personal data may be disclosed as follows:

- Between and among the JFD Group of Companies including our current and future parent, subsidiaries, and other companies under the common control and ownership who provide financial and other services;

- With professional advisors, consultants, vendors, suppliers and other service providers so that we may perform our obligations towards you. Such advisors, consultants, service providers and suppliers enter into contractual agreements with JFD by which they observe confidentiality and data protection according to the data protection law and GDPR.

It must be noted that we may disclose data about you for any of the reasons set out hereinabove or if we are legally required to do so, or if we are authorised under our contractual and statutory obligations or if you have given your consent.

Under the circumstances referred to above, recipients of your personal data may be:

- Supervisory and other regulatory and public authorities, notary offices, tax authorities, criminal prosecution authorities as much as a statutory obligation exists;

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- Government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests;

- Credit and financial institutions such as banks, payment systems and payment service providers, institutions participating in the trade execution and execution venues (for example regulated markets, multilateral trading facilities, trade repositories and other local or foreign europe)processing your transactions;

- External legal consultants authorised by the Company;

- Financial and business advisors authorised by the Company;

- Auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes;

- Marketing and advertising agencies;

- Fraud prevention agencies;

- File storage companies, archiving and/or records management companies, cloud storage companies;

- External authorised processors for processing client data;

- Debt collectors subject to bankruptcy or insolvency claims;

- Potential or actual purchasers and/or transferees and/or assignees and/or charges of any of the Company's benefits, rights, title or interest under any agreement between the customer and the Company, and their professional advisers, service providers, suppliers and financiers.

- Any members of the JFD Group, which shall mean any of the ultimate holding companies and their respective affiliates/subsidiaries.

- Third party providers when you use our website, communication systems and trading platforms which are provided to us by third parties;

- Any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions of Service or other relevant agreements;

- Service providers and specialist advisers who have been contracted to provide us with services such as administrative, IT, analytics and online marketing optimization,

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financial, regulatory, compliance, insurance, research or other services;

- Introducing europe and affiliates with whom we have a mutual relationship;

- Anyone authorised by you.

We endeavour to disclose to any third parties only the minimum personal data that is required to perform their contractual obligations to us. Our third-party service providers are not permitted to share or use personal data we make available to them for any other purpose than to provide services to us.

Our websites may have links to external third-party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

6. How we use the personal information we collect

If you have given us your explicit consent for processing (other than for the reasons set out below), the lawfulness of such processing relies on your consent. Additionally, your consent is assumed when the Company is transferring your personal information outside the European Economic Area, where this is necessary to fulfil its contractual obligations to you. Remember, you have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

We are furthermore obligated to collect such personal data not only for the commencement and execution of a business relationship with you but also for the performance of our contractual, regulatory, statutory and legal obligations.

Kindly note that if you do not provide us with the required data, then we will not be allowed to commence or continue our business relationship either to you as an individual or as the authorised representative/agent or beneficial owner of a legal entity.

7. Why we process your personal data and on what legal basis

As mentioned earlier we are committed to protecting your privacy and handling your data in an open and transparent manner and as such we process your personal data in accordance with the General Data Protection Regulation (GDPR) and the local data protection law for one or more of the following reasons:

A. For the performance of a contract:

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We process personal data in order to offer financial services based on contracts with you but also to be able to complete our acceptance procedure so as to enter into a business relationship with prospective customers. The purpose of processing personal data depends on whether the customer is a natural or legal entity, depends on the classification/categorisation of the client (i.e. retail, professional) and to the requirements for each service.

B. For Identity Verification purposes:

The Company needs to perform its due diligence measures and apply the principles of KYC (Know-Your-Client) before entering a client relationship in order to prevent actions, such as money laundering or terrorist financing, and also to perform other duties imposed by law. Therefore, we collect from our clients' identity verification information (such as images of your government issued national ID card or International Passport, or driving licence or other governmental proof of identification, as permitted by applicable laws) or other authentication information. We are also requesting our clients to provide us with a recent Utility Bill in order to verify their address. Further to this, the Company can use third parties which carry out identity checks on its behalf.

C. For compliance with a legal obligation:

There are a number of legal obligations emanating from the relevant laws to which we are subject as well as statutory requirements. There are also various supervisory authorities whose laws and regulations we are subject to.

Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.

These include amongst others transaction reporting requirements, assessment of the clients' knowledge and experience, FATCA and CRS reporting.

D. For the purposes of safeguarding legitimate interests:

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. Examples of such processing activities include:

- Initiating court proceedings and preparing our defence in litigation procedures,

- Means and processes we undertake to provide for the Company's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures,

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- Measures to manage business and for further developing products and services,

- Sharing your personal data within the JFD Group for the purpose of updating/verifying your personal data in accordance with the relevant anti-money laundering compliance framework,

- The transfer, assignment (whether outright or as security for obligations) and/or sale to one or more persons and/or charge and/or encumbrance over, any or all of the Company's benefits, rights, title or interest under any agreement between the customer and the Company.

E. For Marketing Purposes:

JFD may use client data, such as location or trading history to deliver any news, analysis, research, reports, campaigns and training opportunities that may interest the client, to their registered email address or via telephone. You always have the right to object at any time to the processing of your personal data for marketing purposes or unsubscribe to the provision of marketing related emails by the Company, via the following ways:

a) Contact any time our customer support department via email: support@jfdeurope.com;

b) Through myJFD portal under "Notification Settings" section.

8. How we treat your personal data for marketing activities and whether profiling is used for such activities

We may process your personal data to inform you about products, services and offers that may be of interest to you. The personal data that we process for this purpose consists of information you provide to us and data we collect and/or infer when you use our services, such as information on your transactions. We study all such information to form a view on what we think you may need or what may interest you. In some cases, profiling is used, i.e. we process your data automatically with the aim of evaluating certain personal aspects in order to provide you with targeted marketing information on products.

We can only use your personal data to promote our products and services to you if we have your explicit consent to do so – by clicking on the tick box during the sign up procedure – or in certain cases, if we consider that it is in our legitimate interest to do so.

Further, you have the option to choose whether you wish to receive marketing related emails (company news, information about campaigns, the company's newsletter, the company's strategic report, etc.) to your provided email address by clicking the relevant tick box during the sign up procedure.

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You have the right to object at any time to the processing of your personal data for marketing purposes or unsubscribe to the provision of marketing related emails by the Company, via the following ways:

a) Contact any time our customer support department via email: support@jfdeurope.com ;

b) Through myJFD portal under “Notification Settings” section ;

9. Period of keeping your personal information

At JFD, we prioritize the security and privacy of your personal information. We want to assure you that we will only retain your data for as long as necessary to maintain a positive and productive relationship with you, whether as an individual or in connection with a legal entity you represent or beneficially own.

Once our business engagement concludes, we are obligated to retain your data for a maximum of seven years to comply with regulatory and legal standards. In certain situations, such as meeting other legal obligations, resolving disputes, preventing fraud, or enforcing our terms and conditions, we may need to keep some of your information for an additional three years beyond the initial period.

Please note that once your personal data is no longer needed, we take the utmost care in securely deleting or destroying it.

10. Your Rights

You have the following rights and protections in terms of processing the personal data we hold about you:

1. Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it (commonly known as a “data subject access request”);

2. Request rectification/correction of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected. We may request additional information and documentation required to validate the need for the requested change of data.

3. Request erasure of your personal information. You can ask us to erase your personal data, exercising your right “to be forgotten”, where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your

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request. This request to erase your personal data will result in the closure of your account and termination of the client relationship. However, the Company is required to maintain the client's personal data to comply with its legal and regulatory requirements, as well as in accordance with internal compliance requirements in relation to the maintenance of records. We shall preserve data for at least five years following the termination of the client relationship, unless other terms for the preservation of data or documents are prescribed by law.

4. Object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for such processing which override your interests, rights and freedoms or processing is required for the establishment, exercise or defence of legal claims.

5. You also have the right to object to your personal data being processed for direct marketing purposes. This also includes profiling in as much as it is related to direct marketing. If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

6. Request to receive a copy of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organisations. You also have the right to have your personal data transmitted directly by ourselves to other organisations you will name ("right to data portability").

7. Withdraw your consent at any time where we are relying on consent to process your personal data.

In order to exercise any of your rights, or if you have any other questions about our use of your personal data, please contact us through the ways mentioned in our website at: https://www.jfdeurope.com/contact

We try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.

We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

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11. Automated decision-making

In establishing and carrying out a business relationship, we generally do not use any automated decision-making. We may process some of your data automatically, with the goal of assessing certain personal aspects (profiling), in order to enter into or perform a contract with you for data assessments (including on payment transactions) which are carried out in the context of combating money laundering and fraud. An account may be detected as being used in a way that is unusual for you or your business. These measures may also serve to protect you.

12. Geographical Area of Processing

As a general rule, the client data is processed within the European Union/European Economic Area (EU/EEA), but in some cases it is transferred to and processed in countries outside the EU/EEA and/or to other companies of the JFD Group as well as service providers who are engaged on our behalf and who are outside the European Economic Area (EEA). When you give us your personal data, you agree to us doing this. This exception applies to the transfer of client data when it is required by law, e.g. reporting obligation under tax law and other tax treaties (FATCA and CRS).

Processors in third countries are obligated to comply with the European data protection standards and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR Article 46.

Upon request, the client may receive further details on client data transfers to countries outside the EU/EEA.

13. Other related information

We use appropriate technical, organisational, and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction. Unfortunately, no company or service can guarantee complete security. Unauthorised entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

Among other practices, your account is protected by a password for your privacy and security. You must prevent unauthorised access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

Transmission of information via regular email exchange is not always completely secure. The Company however exercises all possible actions to protect clients' personal data, yet it cannot guarantee the security of client data that is transmitted via email; any transmission is at the

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clients' own risk. Once the Company has received the client information it will use procedures and security features in an attempt to prevent unauthorised access.

When you email the Company (via the "Contact Us" page), or using the Live Chat feature, you may be requested to provide some additional personal data, like your name or email address. Such data will be used to respond to your enquiry and verify your identity. Emails are stored on our standard internal contact systems which are secure and cannot be accessed by unauthorised external parties.

14. Your right to lodge a complaint

If you have exercised any or all of your data protection rights and still feel that your concerns about how we use your personal data have not been adequately addressed by us, you have the right to complain by sending an email to legal@jfdeurope.com.

You also have the right to file a complaint to the Office of the Commissioner for Personal Data Protection. Instructions as to how to submit a complaint can be found in their website: www.dataprotection.gov.cy**.** Alternatively, you also have the right to lodge a complaint with the data protection authority of your country of residence.

15. Links of other websites

The JFD Website may include links to other websites on the internet. We are not responsible for the content of these sites or for any other privacy practices on these internet sites. You should read the terms of use and the privacy statements of any such websites. Our terms of use and our Privacy Policy apply only to information collected by us in accordance with this Policy.

16. Minors

JFD Group is not available for users under the age of 18 (or the age requiring legal consent of the jurisdiction the user is located in) (a "**Minor**"). We do not knowingly collect personal information from or about Minors. If you are a Minor, you should not download or use any of our services nor provide any personal information to us. If we become aware that a Minor has shared any information with us, we will delete such information. If you have any reason to believe that a minor has shared any information with us, please contact us at legal@jfdeurope.com

17. Changes to this privacy statement

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The Company reserves the right to modify or amend this Privacy unilaterally at any time in accordance with this provision.

If any changes are made to this Policy, we shall notify you accordingly. The revision date shown on at the end of this page will also be amended. We do however encourage you to review this privacy statement occasionally so as to always be informed about how we are processing and protecting your personal information.

18. Contact Details

For any questions you may have or if you want more details about how we use your personal information, you can contact our Data Protection Officer, located at Kakos Premier Tower, Kyrillou Loukareos 70, 4156 Limassol, email: legal@jfdeurope.com.

19. Cookies

We use cookies to store and collect information about your use of our website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience. To find out more about how we use cookies please see Our Cookie Policy available on our website.

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